

PROPOSAL FOR A CANDIDATE DRAFT GLOBAL TECHNICAL REGULATION:
UNIFORM PROVISIONS CONCERNING VEHICLES
WITH REGARD TO THE INSTALLATION OF LIGHTING AND LIGHT-SIGNALLING DEVICES

Transmitted by the expert from Canada.

Note: The text reproduced below was prepared by the expert from Canada. It contains all comments and suggested changes submitted by GRE with regard to document TRANS/WP.29/GRE/2001/6.

TABLE OF CONTENTS

(To facilitate the discussion, this table of contents organizes the received comments in the chronological order of paragraph that the comments addressed.)

	<u>Page</u>	
2.5.	Comments from the expert from the Netherlands	4
2.7.12.	Comments from the expert from the Netherlands	4
2.16.1.	Comments from The Society of Motor Manufacturers and Traders (SMMT)	12
5.10.1.	Comments from the expert from Japan	15
5.15.	Comments from SMMT	12
5.24.	Comments from the expert from the Netherlands	4
5.19.	Comments from SMMT	12
5.21.	Comments from SMMT	12
6.2.4.2.	Comments from the expert from Japan	15
6.4.1.	Comments from the expert from Japan	15
6.4.2.2.	Comments from SMMT	12
6.5.2.	COMMENTS FROM THE EXPERT FROM GERMANY	8
	Comments from the expert from Japan	15
6.5.3.	Comments from SMMT	12
6.5.4.3.	Comments from the expert from the Netherlands	4
6.5.5.1.	Comments from SMMT	12
6.5.5.3.	Comments from the expert from the Netherlands	4
	Comments from SMMT	12
6.5.-Figure	Comments from the expert from the Netherlands	5
	Comments from SMMT	13
6.5.8.	Comments from SMMT	13
6.7.	Comments from the expert from the Netherlands	5
6.7.2.	Comments from the expert from Germany	10
	Comments from SMMT	13
6.7.4.1.	Comments from the expert from Germany	10
6.7.4.2.	Comments from the expert from Japan	15

6.7.7.	Comments from the expert from Germany	10
6.7.8.	Comments from the expert from Germany	10
6.9.1.	Comments from the expert from Japan	16
	Comments from the expert from the Netherlands	5
6.9.4.2.	Comments from the expert from Japan	16
6.9.5.1.	Comments from the expert from Japan	16
6.9.5.2.	Comments from the expert from the Netherlands	5
	Comments from SMMT	13
6.10.4.2.	Comments from the expert from Japan	16
6.10.5.1.	Comments from the expert from Japan	17
6.10.5.2.	Comments from the expert from the Netherlands	6
	Comments from SMMT	13
6.12.8.	Comments from the expert from Germany	10
6.13.4.1.	Comments from the expert from Japan	17
	Comments from SMMT	13
6.14.&17.	Comments from the expert from Germany	10
6.14.1.	Comments from the expert from Japan	17
6.14.4.1.	Comments from SMMT	13
6.14.4.2.	Comments from the expert from Japan	17
6.15.4.1.	Comments from SMMT	13
6.17.1.	Comments from the expert from the Netherlands	6
6.17.4.2.	Comments from the expert from Japan	17
6.17.4.3.	Comments from the expert from Japan	18
	Comments from the expert from the Netherlands	6
	Comments from SMMT	13
6.18.1.	Comments from the expert from Germany	10
6.18.4.3.	Comments from the expert from Japan	18
	Comments from the expert from the Netherlands	7
	Comments from SMMT	14
6.18.5.	Comments from SMMT	14
6.18.8.	Comments from the expert from Germany	10
6.19.1.	Comments from the expert from Japan	18
6.19.4.1.	Comments from the expert from Germany	10
6.19.4.3.	Comments from the expert from Germany	10
6.19.7.	Comments from the expert from Germany	11
6.19.8.	Comments from the expert from Germany	11
6.20.	Comments from the expert from Germany	11
6.20.4.2.	Comments from SMMT	14
6.21.	Comments from the expert from Germany	11

COMMENTS FROM THE NETHERLANDS:

[2.5. "Function" ...]

SUGGESTION:

"Function, in terms of lighting and light signalling, is the purpose for which a device (lamp) is meant to be used."

2.7.12. "Stop lamp" means a lamp used to indicate to other road-users to the rear of the vehicle that the speed of the vehicle is intentionally [retarded] in a prescribed manner.

QUESTION:

Also for (adaptive) cruise controls?

5.24. With the exception of retro-reflectors, a lamp even bearing an approval mark [or other required markings] is deemed to be not present when it cannot be made to operate by the sole installation of a light source.

EDITORIAL:

original: ...not to be present...

6.5.4.3. In length:

Front direction indicator lamps:

at the front.

Side direction indicator lamps:

the distance **d** (see Figure 2) between the side direction indicator lamp and front of the vehicle shall [not exceed 2.5 m (**Reg.48 requires 1.8 m - 2.5 m is a relaxation for M1 and N1 vehicles and special structural problems**) or 1/2 of the vehicle's overall length, whichever is less].

REMARK:

2.5 m is NOT the same as 2500 mm, considering (measurement) tolerances. In present form Reg.48 states these distances in millimetres.

6.5.5.3. For the direction indicator to be considered visible throughout the angles of geometric visibility one of the following shall be met:

The minimum luminous intensity within the above angles must not be less than 0.3 cd;

QUESTION:

Should a requirement for measuring the luminous intensity be included in a regulation dealing with the installation of the devices?

or

Throughout the angles of geometric visibility, with the outward angle up to 45°, the lamp must provide an unobstructed view of the apparent surface of at least 12.5 cm², except for the side direction indicator for which the minimum area is 10 cm². The apparent surface of any retro-reflector shall be excluded.

6.5. DIRECTION INDICATOR LAMP

FIGURE 2

SUGGESTION:

To add figure title(s) in Figure 2...

6.7. STOP LAMP

GENERAL QUESTION:

Wherever a CHMSL is mentioned, what type of stop lamp is meant?
An S3-type stop lamp only, or 'any' type of stop lamp?

6.9. FRONT POSITION LAMP

6.9.1. Presence

Mandatory. on all motor vehicles. Mandatory on trailers over 1,600 mm wide. Optional on trailers which are not more than 1,600 mm wide. (reinstated) /CDN/

EDITORIAL:

After (first) Mandatory to delete the full stop..

6.9.5.2. For the front position lamp to be considered visible throughout the angles of geometric visibility the following shall be met:

The minimum luminous intensity within the above angles must not be less than 0.05 cd;

QUESTION:

Should a requirement for measuring the luminous intensity be included in a regulation dealing with the installation of the devices?

or

Throughout the angles of geometric visibility, with the outward angle up to 45°, the lamp must provide an unobstructed view of the projected apparent surface of at least 12.5 cm².
The illuminating surface area of any retro-reflector ~~that does not transmit light~~ shall be excluded. :

QUESTION:

Why delete ...that does not transmit light... ?

/ OICA (CDN modifications are double underlined.) /

6.10.5.2. For the rear position lamp to be considered visible throughout the angles of geometric visibility the following shall be met:

The minimum luminous intensity within the above angles must not be less than 0.05 cd;

QUESTION:

Should a requirement for measuring the luminous intensity be included in a regulation dealing with the installation of the devices?

or

Throughout the angles of geometric visibility, with the outward angle up to 45°, the lamp must provide an unobstructed view of the

projected apparent surface of at least 12.5 cm².
The illuminating surface area of any retro-reflector ~~that does not~~
~~transmit light~~ shall be excluded.

QUESTION:

Why delete ...that does not transmit light... ?

6.17. / **OICA** (CDN modifications are double underlined.) /
SIDE RETRO-REFLECTOR, NON-TRIANGULAR

6.17.1. Presence

Mandatory: ~~On all motor vehicles the length of which exceeds 6 m.~~
~~On all trailers.~~ /CDN/

Optional: ~~On motor vehicles the length of which does not~~
~~exceeds 6 m.~~ /CDN/

/Japan would like to revert to the original text. This is unacceptable for CDN. In Japan side retro-reflectors on vehicles less than 6 m are optional(allowed), while in Canada front and rear retro-reflectors are mandatory on all vehicles./

QUESTION (EDITORIAL):

In last sentence "while in Canada... .. on all vehicles.", I suppose is meant ...front and rear SIDE retro-reflectors... ?

6.17.4.3. In length:

[At least one side retro-reflector must be fitted to the middle third of the vehicle. ~~the foremost side retro reflector being not further than 3 m from the front; in the case of trailers, account shall be taken of the length of the drawbar for the measurement of this distance. The distance between two adjacent side retro reflectors shall not exceed 3 m. This does not, however, apply to M1 and N1 /698/category vehicles. If the structure of the vehicle makes it impossible to comply with such a requirement, this distance may be increased to 4 m.~~ The distance between the rearmost side retro-reflector and the rear of the vehicle shall not exceed 1 m. However, for motor vehicles the length of which does not exceed 6 m, it is sufficient to have one side retro-reflector fitted within the first third and/or one within the last third of the vehicle length.] /CDN/

QUESTION:

Is there a possible CONTRADICTION between what is proposed (CDN) here in paragraph 6.17.4.3. and the paragraphs 6.17.1 and 6.17.2?

Because here in 6.17.4.3., at least when you read the "or"-version, you could accept (only) one per side, whereas in 6.17.2 it states: "Two on each side of the vehicle".

[6.18.4.3. In length: at least one side-marker lamp must be fitted to the middle third of the vehicle. ~~the foremost side marker lamp being not further than 3 m from the front; in the case of trailers account shall be taken of the length of the drawbar for the measurement of this distance. The distance between two adjacent side marker lamps shall not exceed 3 m. If the structure of the vehicle makes it impossible to comply with such a requirement, this distance may be increased to 4 m.~~ The distance between the rearmost side-marker lamp and the rear of the vehicle shall not exceed 1 m.

However, for vehicles the length of which does not exceed 6 m ~~and for chassis-cabs~~, it is sufficient to have one side-marker lamp fitted within the first third and/or within the last third of the vehicle length.] /CDN/

QUESTION:

Is there a possible CONTRADICTION between what is proposed (CDN) here in paragraph 6.18.4.3. and the paragraphs 6.18.1 and 6.18.2? Because here in 6.18.4.3., at least when you read the "or"-version, you could accept (only) one per side, whereas in 6.18.2 it states: "Two on each side of the vehicle".

COMMENTS FROM GERMANY

- **PROPOSAL (By Dr. Manz - Germany)**

„6.5. DIRECTION INDICATOR LAMP

6.5.1. Presence

Mandatory.

Paragraph 6.5.2., amend to read:

6.5.2. Number

Motor vehicle:

2 front direction indicator lamps **of a minimum luminous intensity of 500 cd**

2 side direction indicator lamps

2 rear direction indicator lamps + 2 optional rear direction indicator lamps

Trailer:

~~±~~2 side direction indicator lamps~~±~~

2 rear direction indicator lamps + 2 optional rear direction indicator lamps.

Paragraph 6.5.3., amend to read:

6.5.3. Arrangement (see figure below)

Where lamps combining the functions of front direction indicator lamps and side direction indicator lamps are fitted, two supplemental side direction indicator lamps may be installed to meet the visibility requirements of paragraph 6.5.5.

~~[The choice of the photometric characteristics of the front and rear direction indicator lamps must be considered with regard to the distance between these lamps and other lighting and light-signalling devices. In case of the front direction indicator lamp it is its distance from the passing beam headlamp and/or the front fog lamp, if it exists; and for the red rear direction indicator lamp it is its distance from the rear fog lamp if it exists.]~~

* * *

B. JUSTIFICATION

Regarding the problem from the ECE - World:

In ECE Regulation No. 6 are different categories of direction indicators lamps specified.

For front direction indicators lamps the different categories are corresponding to minimum luminous intensities of 175 cd, 250 cd and 400 cd, and they are required for distances of ≥ 40 . mm, ≥ 20 . mm or ≥ 0 of the direction indicators lamp to the headlamp as specified in paragraph 6.5.3. of the ECE Regulation No. 48. The definition of the distance between two lamps is in paragraph 2.17 of the ECE Regulation No. 48.

2. 17. " Distance between two lamps " which face in the same direction means the shortest distance between the two apparent surfaces in the direction of the reference axis. Where the distance between the lamps clearly meets the requirements of the Regulation, the exact edges of apparent surfaces need not be determined;

Regarding the problem from the FMVSS Standard 108:

In Standard 108 are two different "categories" of front direction indicators lamps defined by two different levels of minimum luminous intensities, which are 200 cd and (by the factor 2.5) 500 cd.

The use of the front direction indicators lamps of these different two different levels of minimum luminous intensities are corresponding to distance of ≥ 100 . mm from the optical centre of the direction indicators lamp to the lighted edges of the headlamp as required in paragraph 571.108 section S5.3.1.7. (10-1-99 Edition) and as specified in a former SAE Standard J1221 (Headlamp - Turn Signal Spacing - DEC 84).

The SAE Standard J1221 is not more in force as a Standard, but will be used for decisions on the base of 108.

Conclusion:

The procedures to determine the distances are different in the definition and not transformable. To solve this problem it is necessary to find a harmonized definition and procedure to verify the legal use of front direction indicators lamps of the different categories.

The discussion regarding possible arrangements of lamps in a future AFS - design or some modern designs of today, e.g. the direction indicator is inside the arrangement of headlamps (passing and/or driving beam(s), front fog lamps etc.), shown that the definition as given with the paragraph 2.17 of the ECE Regulation No. 48 causes problems. The problem could be happen that either

- the procedure is applicable and the result meets the requirement, but the acceptance in praxis is not given or
- the procedure is not applicable, because the arrangements of the lamps are too complex.

For the future is it necessary to have a definition, which makes sense in the view of road safety, this needs at least a luminance to distance requirement resulting a sufficient contrast between the function front direction indicators and other lamps.

Therefore is for the time being the best solution to use the minimum luminous intensity of 500 cd, which complies with both legislative areas and nobody has any problem with mounting distance of the direction indicators lamp to the headlamp.

6.7. STOP LAMP

6.7.2. Number

The reference to categories according to Regulation No. 7 should be reviewed.

6.7.4. Position

6.7.4.1. In width:

For clarification, the third paragraph should read:

"However, in the case where a CHMSL composed of two lamps is installed, ..."

6.7.7. Electrical connections

The second sentence should be deleted. The text in square brackets could also be deleted, as it is covered by the first sentence.

6.7.8. Tell-tale

In view of the implications for traffic safety regarding correct operation of stop lamps, the requirements should be reviewed in order to provide a warning to the driver in case of stop lamp failure. It is proposed to insert provisions corresponding to the OICA proposal regarding paragraph 6.5.8. in informal document No. 14 for the 46th GRE session.

6.12. PARKING LAMP

6.12.8. Tell-tale

The second sentence should be deleted.

6.14. & 6.17. RETRO-REFLECTORS

The differentiation between triangular and non-triangular devices should be reviewed.

The definition in par. 2.9.3. concerning the illuminating surface of a retro-reflector has been amended at the 46th GRE session.

6.18. SIDE-MARKER LAMPS

6.18.1. Presence

The substance of the existing text in Regulation No. 48 should be maintained.

6.18.8. Tell-tale

The second sentence should be deleted.

6.19. DAYTIME RUNNING LAMP

6.19.4. Position

6.19.4.1. In width:

In order to eliminate problems of accommodating daytime running lamps into the front design of the vehicle it is proposed to insert only the requirement: "Not less than 400 mm apart".

6.19.4.3. In length:

As noted in the points for further discussion, the expression "cause discomfort" should be revisited; as a first approach, it is suggested to use the words "discomfort glare" and to explore the possibilities of an objective measurement in the framework of vehicle tests.

6.19.7. Electrical connections

Amend to read:

"The daytime running lamps shall be activated when the device which starts and/or stops the engine is in a position which makes it possible for the engine to operate. A manual deactivation of daytime running lamps shall be possible. The daytime running lamps shall switch off automatically when the headlamps are switched on, except when the latter are used to give intermittent luminous warnings at short intervals."

6.19.8. Tell-tale

As a consequence of the amendments to par. 6.19.7. above, the text should read:

"Mandatory"

6.20. IDENTIFICATION LAMPS (Front and Rear)

It is recalled that the definition of discretionary lamp was to be reviewed; in particular, it would be necessary to specify that the installation of identification lamps may be permitted by national regulations.

6.21. CORNERING LAMP

The GTB proposal has been withdrawn and a new proposal will be submitted by GTB for the 47th GRE session (TRANS/WP.29/GRE/46, par. 13.)

COMMENTS FROM THE SOCIETY OF MOTOR MANUFACTURERS AND TRADERS (SMMT)
- Lighting and Signalling Working Group

- 2.16.1. (5.7.1.) It has been suggested that to make the definition of a single lamp easier to understand and additionally simplify the text, therefore 2.16.1 should comprise only the first three lines ending at the words of the reference axis. The remainder including the provisional reference to "type 'D' lamp" should be deleted.

Note: It is believed that to date there has been two issues caught up within this item,

- (1) the definition of a single lamp
- (2) the issue of reciprocally incorporation.

It is therefore suggested that in addition to the simplification proposed above, explanatory text and sketches for the second issue be incorporated either in annex 3 or a new annex.

- 5.15. We support the option of using the colour red for the rearmost side marker lamp and rearmost side retro-reflector.
- 5.19. The use of the word "rear" in all three places is supported on the grounds of clear and unambiguous interpretation.
- 5.21. We are opposed to the introduction of this paragraph as it is seen as un-necessary, irrespective of the reliability aspect of the additional components.
- 6.4.2.2. For clarification we suggest the following text.
"One or two additional reversing lamps trailers".
- 6.5.3. 2nd paragraph
We are opposed to this paragraph
The front direction indicators should have a specification capable of being installed in any relationship to the headlamps.
Just because ECE Regulation 6 has developed with three specifications is no reason for perpetuating this course.
- 6.5.5.1. Rear direction indicator - motor vehicles
We are of the opinion that an 80° outward angle is unnecessary as on a motor vehicle, the side direction indicator already supplements the rear direction indicator, thus the outward angle need only be 45°.

To require a rear direction indicator to be supplemented by a flashing rear amber side-marker lamp as is the present option prevents the use of a red rearmost side marker lamp and is thus contrary to harmonisation.

- 6.5.5.3 The option of a minimum luminous intensity of 0.3cd should be deleted from here and all subsequent paragraphs.
- 6.5. Figure 2
The categories of direction indicators in the second part of figure 2 should be deleted as they do not relate to a global Technical Regulation.
- 6.5.8. 2nd paragraph
The paragraph, which is the same as that currently in ECE Regulation 48 contains a wording that can cause an incorrect interpretation. e.g. "..... allows the failure of any one of the direction indicator lamps on the vehicle combination thus formed to be detected".
- We are of the opinion that this should read,
"..... allows the failure of any front or rear direction indicator lamps on the vehicle combination thus formed to be detected".
- 6.7.2. Delete the reference to lamp categories (S1 & S2)
- 6.9.5.2. Delete the option of 0.05 cd.
- 6.10.5.2. Delete the option of 0.05 cd.
- 6.13.4.1. The proposed 100 mm dimension is not acceptable in practical terms particularly for all types of vehicle construction, including the cabs of tractor units.
We find it strange that the existing 400 mm of ECE Regulation 48 is unacceptable to Canada after its use for many years in Europe.
- 6.14.4.1. We support the retention of 400mm, particularly as these are usually built into the rear lamp assemblies.
- 6.15.4.1. We support the retention of 400mm.
The rear corners of trailers are the areas most susceptible to damage whilst manoeuvring articulated vehicles.
- 6.17.4.3. We support the deletion of the first paragraph.

With regard to the distance of 400 mm proposed from the front and from the rear of the vehicle, there are considerations that have caused to be reviewed.

- (1) The introduction of more rounded and 'softer' front ends of vehicles in plan form.
- (2) The forward part of semi-trailers that overlap the towing vehicle and where, for swing clearance, and the avoidance of damage, devices have not been required in Europe for the first 4m of their length.

We therefore suggest that the 400 mm distance be increased to [600 mm] and that for semi-trailers the foremost device is allowed up to 4m from the front.

Within the last paragraph, the exclusion clause should align with 6.17.2 and refer to vehicles less than 6m in length.

6.18.4.3. (1 st) We support the deletion of the first paragraph in [] brackets.

6.18.4.3. (2 nd) With regard to the foremost and rearmost SML and the 400 mm dimension we would reiterate the comments made in 6.17.4.3 above.

We see no reason to require side marker lamps (SML) to be mounted on drawbars.

With SML no more than 600 mm from the rear of the towing vehicle and the front of the trailer, then the gap between them would only be 2.8m maximum, if the 4m spacing comes into play.

Do spacings larger than 2.8 m exist between tractor and trailer?

The last paragraph has an exclusion clause for light duty vehicles, but this should be aligned with 6.18.2 and reference made to vehicles less than 6m long.

6.18.5. It is suggested that the wording of the first paragraph be clarified with the addition of;
"If the front and rear SML are being used to supplement the front and rear position lamps and/or the front and rear direction indicators then the forward angle of the foremost and rearward angle of the rearmost must remain at 45°."

6.20.4.2. We suggest for clarification that, "if the door header is narrower than 25mm" is replaced by;
"if the frame above the door is thinner than 25mm".

COMMENTS FROM JAPAN

Japan would like to submit its comments on the document TRANS/WP29/GRE/2001/6, with the proviso that although willing to adopt GTR requirements Japan reserves the right to relax an adopted GTR requirement(s) when deemed necessary.

1) Paragraph 5.10.1. Japan is opposed to the exemption of a red rearmost side marker lamp from forward non-visibility requirement. The requirements should also include the rearmost side marker lamp.

Justification

Since in reality red side marker lamps project forward a greater intensity of light than side marker lamps of other colors, the whole paragraph will become unnecessary if a red rearmost side marker lamp is exempted.

For the visibility of red light towards the front of a vehicle, *with the exception of a red rearmost side-marker lamp*, there must be no direct visibility of the apparent surface of a red lamp if viewed by an observer moving within Zone 1 as specified in annex 2.

2) Paragraph 6.2.4.2. Japan proposes the addition at the end of the paragraph of a phrase prescribing the maximum installation height of [950] mm for passing beam headlamps equipped with gas-discharge light sources.

not less than 500 mm above the ground and
not more than [1,200 mm] above the ground.
[for vehicles defined in paragraph 2.27
not more than 1,500 mm above the ground.]

*However, for vehicles whose passing beam headlamps are equipped with
gas-discharge light sources not more than 950 mm above the ground.*

(Justification will be given at the informal meeting in September.)

- 3) Paragraph 6.4.1. Japan requests the mandatory installation of reversing lamps on trailers as well.

Justification

There are cases for a trailer reversing on tractor.

Presence

Mandatory *on motor vehicles. Optional on trailers.*

- 4) Paragraph 6.5.2. Since the GTR at issue does not include heavy vehicles in its scope at present, Japan requests the amendment as follows;

Trailer:

[2 side direction indicator lamps]

2 rear direction indicator lamps + 2 optional rear direction indicator lamps.

- 5) Paragraph 6.7.4.2. Concerning the installation height of stop lamps, Japan withdraws its comments submitted last year.

Justification

Based on the result reached at the informal meeting in January.

~~For the symmetrical pair of stop lamps S1 or S2 categories devices/edit/:~~

not less than 350 mm above the ground and ~~not~~

not more than 1,500 mm above the ground (2,100 mm if the shape of the bodywork makes it impossible to keep within 1,500 mm and if the optional lamps are not installed.— /Japan/ If

- 6) Paragraph 6.9.1. Japan requests mandatory installation of position lamps on those trailers which are not more than 1,600 mm wide.

Justification

There could be tractor vehicles with the narrower width.

Presence

Mandatory. on all motor vehicles. Mandatory on trailers over 1,600 mm wide. Optional on trailers which are not more than 1,600 mm wide. (reinstated) /CDN/

- 7) Paragraph 6.9.4.2. Concerning the installation height of front position lamps, Japan withdraws its comments submitted last year.

Justification

Based on the result reached at the informal meeting in January.

not less than 350 mm above the ground and /edit/

not more than 1,500 mm above the ground (2,100 mm for O1 and O2 categories of vehicles, or if any other categories of vehicles if the

*shape of the bodywork makes it impossible to keep within 1,500 mm).
/Japan/*

- 8) Paragraph 6.9.5.1. Japan is opposed to the OICA proposal for reducing the visible angle of front position lamps.

Justification

As Japan is currently considering amendment of its regulation to end the requirement of side marker lamps on short vehicles, the minimum outward visible angle of 80 degrees is necessary for front position lamps in order to realize the side marker lamp non-requirement.

~~Horizontal angles for the two position lamps /CDN/:~~

45° inwards and *80 45° 80°*outwards. /OICA/

~~In the case of trailers, the angle inwards may be reduced to 5°.~~

- 9) Paragraph 6.10.4.2. Concerning the installation height of rear position lamps, Japan withdraws its comments submitted last year.

Justification

Based on the results reached at the informal meeting in January.

not less than 350 mm above the ground and /edit/

not more than 1,500 mm above the ground (*2,100 mm for O1 and O2 categories of vehicles, or if any other categories of vehicles if the shape of the bodywork makes it impossible to keep within 1,500 mm*). /Japan/

- 10) Paragraph 6.10.5.1. Japan is opposed to the OICA proposal for reducing the visible angle of rear position lamps.

Justification

As Japan is currently considering amendment of its regulation to end the requirement of side marker lamps on short vehicles, the minimum outward visible angle of 80 degrees is necessary for rear position lamps in order to realize the side marker lamp non-requirement.

~~Horizontal angles for the two position lamps /CDN/:~~

45° inwards and *80 45° 80°*outwards. /OICA/

~~In the case of trailers, the angle inwards may be reduced to 5°.~~

- 11) Paragraph 6.13.4.1. As OICA, Japan objects to the tightening of the requirement concerning the EOML distance from the vehicle's extreme outer edge.

Justification

If the EOML distance is prescribed to be not more than 100 mm, in Japan there will be vehicles on which it is physically impossible to install the mandatory outer mirrors used to view the immediately front and immediately left areas.

- 12) Paragraph 6.14.1. Japan is opposed to the Canadian proposal because we consider the mandatory installation of rear reflex reflectors is sufficient only for motor vehicles.

Justification

The triangular rear reflex reflector is mandatory on trailers.

Mandatory on motor vehicles. (*reinstated*) /CDN/

Provided that they are grouped together with the other rear light-signalling devices, optional on trailers. (reinstated) /CDN/

- 13) Paragraph 6.14.4.2. Concerning the installation height of rear reflex reflectors, Japan withdraws its comments submitted last year.

Justification

Based on the results reached at the informal meeting in January.

~~above the ground,~~ not less than 250 mm and ~~nor~~
not more than 900 mm above the ground /edit/(1,500 mm if the shape
of the bodywork makes it impossible to keep within 900 mm). /Japan/

- 14) Paragraph 6.17.4.2. Concerning the installation height of side reflex reflectors, Japan withdraws its comments submitted last year.

Justification

Based on the results reached at the informal meeting in January.

~~above the ground,~~
not less than 250 mm and ~~nor~~
not more than 900 mm above the ground /edit/(1,500 mm if the shape
of the bodywork makes it impossible to keep within 900 mm). /Japan/

- 15) Paragraph 6.17.4.3. Japan is opposed to the Canadian proposal that the distance of a side reflex reflector from the vehicle's front or rear end be not more than 400 mm.

Justification

For small buses and some other types of vehicles, it is not possible to install a side reflex reflector within the proposed distance due to the presence of a glass door for stepping in and out of the vehicle. Of course, there are such buses which do not meet the requirement of 400 mm due to the glass door even though they are within the scope of R48 .

- 16) Paragraph 6.18.4.3. Japan objects to the Canadian proposal that the distance of a side marker lamp from the vehicle's front or rear end be not more than 400 mm.

Justification

For small buses and some other types of vehicles, it is not possible to install a side reflex reflector within the proposed distance due to the presence of a glass door for stepping in and out of the vehicle. Same as in 16), there are such buses which do not meet the requirement of 400 mm due to the glass door even though they are within the scope of R48 .

- 17) Paragraph 6.19.1. In order to enable countries to prohibit daytime running light (DRL) for reasons of their respective national conditions, Japan requests that DRL be prescribed as discretionary lamps.

Optional Discretionary on motor vehicles. Prohibited on trailers.
(reinstated) /CDN/
